

ORIGINAL

GENERAL COUNSEL
OF COPYRIGHT

OCT 23 1998

Before the
UNITED STATES COPYRIGHT OFFICE
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In the Matter of

DIGITAL PHONORECORD DELIVERY
RATE ADJUSTMENT PROCEEDING

Docket No. 96-4
CARP DPRA

COMMENTS TO MEMORANDUM OF MNPA, SGA AND
RIAA REGARDING ADOPTION OF RATES FOR
GENERAL DIGITAL PHONORECORD DELIVERIES

The United States Telephone Association ("USTA") submits this response to the Register's Order dated October 16, 1998. USTA's concerns were fully addressed by the USTA/NMPA/RIAA agreement. As long as either (i) that agreement is implemented, or (ii) the Office defers action on the "incidental" phonorecord regulation (section 255.6) USTA has no further interest in this proceeding.

Dated: October 23, 1998

Respectfully Submitted



Bruce G. Joseph
Valerie E. Keller
Wiley Rein & Fielding
1776 K Street, NW
Washington, DC 20006
(202) 429-7000

Counsel for the United States
Telephone Association

CERTIFICATE OF SERVICE

I hereby certify that I have on this 23rd day of October 1998 served the foregoing Comments to Memorandum of MNPA, SGA and RIAA Regarding Adoption of Rates for General Digital Phonorecord Deliveries by first class mail to the following.

A handwritten signature in cursive script, reading "Valerie E. Keller", written in black ink.

Valerie E. Keller

SERVICE LIST
Docket No. 96-4 CARP DPRA

Seth D. Greenstein
McDermott, Will & Emery
600 Thirteenth Street, N.W.
Washington, D.C. 20005-3096
Counsel for Coalition of Internet Webcasters

Marvin L. Berenson
Joseph J. DiMona
BMI
320 West 57th Street
New York, New York 10019

Michael J. Remington
Joseph J. Lopez
Drinker Biddle & Reath LLP
Suite 900
901 15th Street, N.W.
Washington, D.C. 20005
Counsel for Broadcast Music, Inc.

Cary H. Sherman
Steven M. Marks
Recording Industry Association
of America
1330 Connecticut Avenue, N.W.
Washington, D.C. 20036

Steven R. Englund
Arnold & Porter
555 Twelfth Street, N.W.
Washington, D.C. 20004-1202
Counsel for RIAA

Edward P. Murphy
National Music Publishers' Association
and the Harry Fox Agency, Inc.
711 Third Avenue
New York, New York 10017

Peter L. Felcher
Carey R. Ramos
Paul, Weiss, Rifkind,
Wharton & Garrison
1285 Avenue of the Americas
New York, New York 10019
***Counsel for the National Music Publishers'
Association & the Harry Fox Agency, Inc.***

George David Weiss
The Songwriters Guild of America
1500 Harbor Boulevard
Weehawken, New Jersey 07087

Bruce A. York
Ann E. Chaitovitz
American Federation of Television
and Radio Artists
260 Madison Avenue
New York, New York 10017

Arthur Levine
Finnegan, Henderson, Farabow, Garrett
& Dunner
1300 I Street, N.W.
Washington, D.C. 20005
***Counsel for American Federation of
Television and Radio Artists***

Bruce D. Sokler
Fernando R. Laguarda
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P.C.
701 Pennsylvania Avenue, N.W.
Suite 900
Washington, D.C. 20004
***Counsel for Digital Cable Radio Associates
& America Online, Inc.***

Beverly A. Willett
414 Clinton Street
Brooklyn, New York 11231

Joan McGivern
ASCAP
One Lincoln Plaza
New York, New York 10023

I. Fred Koenigsberg
White & Case LLP
1155 Avenue of the Americas
New York, New York 10036-2787
Counsel for ASCAP

Henry R. Kaufman
SESAC, Inc.
421 West 54th Street
New York, New York 10019

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WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

BRUCE G. JOSEPH
(202) 429-7258

October 23, 1998

FACSIMILE
(202) 429-7049

VIA HAND DELIVERY

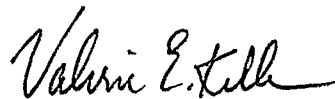
David Carson, Esquire
U.S. Copyright Office
Library of Congress
101 Independence Avenue, S.E.
Suite LM-403
Washington, D.C. 20559-6000

Dear Mr. Carson:

In response to the Register's Order, we enclose duplicate copies of the United States Telephone Association's response.

Best regards.

Sincerely,



Bruce G. Joseph
Valerie E. Keller

Enclosures